

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
This document relates to:  <i>Faulkner v. Bin Laden, et al.</i>	09-cv-7055 (GBD)(SN)  ECF Case

**DECLARATION OF JAMES F. PETERSON IN SUPPORT OF  
PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT JUDGMENT  
AGAINST ISLAMIC EMIRATE OF AFGHANISTAN**

JAMES F. PETERSON, pursuant to 29 U.S.C. § 1746, declare as follows:

1. I am an attorney in good standing in the District of Columbia. I have been admitted to practice in this Court for this case and appear as counsel for Plaintiff Lynn Faulkner. While Plaintiff is part of other cases in the MDL seeking relief from various other defendants, Plaintiff here seeks relief from the Islamic Emirate of Afghanistan and has not previously received any such relief.

2. Attached as Exhibit 1 is a true and correct copy of the “Declaration of Lynn Faulkner,” submitted earlier in the case in support of Plaintiff’s motion for default judgment.

3. Exhibit 2 is a copy of the Final Report of the National Commission on Terrorist Attacks Upon the United States, available at <https://www.govinfo.gov/app/details/GPO-911REPORT/context>. The electronic file size of the report is too large for filing through the CM/ECF system. Copies will be provided as requested.

4. Attached as Exhibit 3 is copy of the expert report of Dr. Antonio Giustozzi prepared and submitted to the Court during the jurisdictional discovery phase of this case.

5. Attached as Exhibit 4 is an updated economist's report as to economic loss. The report was also submitted and accepted in ECF No. 7358-2 at 25 (*Ber Barry Aron v. Islamic Republic of Iran*, No. 1:20-cv-09376(GBD)(SN)). The original report, which was prepared in support of an application to the Victim Compensation Fund for victims of 9/11, calculates the value of the lost earnings of Wendy Faulkner.

I declare under penalty of perjury that the foregoing is true and correct.

Executed July 14, 2022

/s/ James F. Peterson

**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2022, a copy of the foregoing was filed via the Court's CM/ECF filing system, which sent notification of such filing to counsel of record in this case.

/s/ James F. Peterson  
James F. Peterson